

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CIVIL ACTION NO. 1:20-cv-0072

KELLY WALKER )  
Plaintiff, )  
v. )  
ROBERT LAYNE DEESE, MARSH )  
USA, INC. THOMAS HEATH )  
WOODARD, DANIEL DEAN )  
SHERRILL, JR. )  
Defendants. )  
\_\_\_\_\_  
)

**THOMAS HEATH WOODARD**  
**AND RLI INSURANCE**  
**COMPANY'S MOTION FOR**  
**SUMMARY JUDGMENT**

Defendants Thomas Woodard and RLI Insurance Company hereby move for summary judgment pursuant to Fed. R. Civ. P. 56(a) because there is no genuine issue of material fact, and the Defendants are entitled to judgment as a matter of law. This Motion is based upon the accompanying Brief, the exhibits to the Brief, and upon the court file in this case.

Respectfully submitted: April 23, 2021.

/s/ Sean F. Perrin  
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Sean F. Perrin, N.C. State Bar #22253  
Womble Bond Dickinson (US) L.L.P.  
One Wells Fargo Center, Suite 3500  
301 South College Street  
Charlotte, NC 28202-6025  
Telephone: (704) 331-4992  
[Sean.perrin@wbd-us.com](mailto:Sean.perrin@wbd-us.com)  
*Attorney for Defendants*